

UNITED STATES GOVERNMENT

M E M O R A N D U M

DATE: December 28, 1993

REPLY TO

ATTN OF: Robert Cleveland, SED, OET, 653-8169

SUBJECT: Item to be placed in Docket ET 93-62

TO: Secretary, FCC

Please place the attached letter from David Smith Forsman, dated December 9, 1993, into the record of ET Docket 93-62. "Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation." Four copies and the original letter are enclosed.

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FEDERAL COMMUNICATIONS COMMISSION  
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ENGINEERING  
AND TECHNOLOGY

3115 Seventh Street  
Lewiston, ID 83501-4607  
9 December 1993

Re: The Honorable Larry E. Craig  
FCC--15 November 1993  
Reply # 8304201

Docket # 93-62

Mr. Thomas P. Stanley  
Chief Engineer  
Federal Communications Commission  
Washington, D.C. 20554

Dear Mr. Stanley:

Thanks for taking the time to listen to my comments regarding amateur radio and AM/FM broadcasting. My letters to Senator Larry E. Craig (Idaho) contain some of the general worries that I have pertaining to radiofrequency radiation (RFR). I, personally, have only minor fears of RFR--public hysteria is my greatest concern!

Though I would not care to live my life in the antenna tuning house of a high-power transmitting facility, I do believe that occasional and reasonable exposure to RFR creates only limited health hazards. I have watched many generations of field mice grow-up in less-than-tidy tuning houses, where they sometimes nested within live tuning coils. Earth's creatures do many things to stay warm during the Western winters.

I do not deny that RFR guidelines are a reasonable approach when applied to continuous-duty radio transmission services, but it is likely that ANSI C95.1-1992 poses an excessive set of regulations for intermittent-duty services such as amateur, two-way, and citizen band.

Please understand that I would prefer the FCC to use a conservative approach when implementing the new ANSI standard. If people were obviously succumbing to RFR, then it would be only fitting to restrict it to safe levels. However, if the opposite were true (near-zero deaths), then the whole procedure would end up being a simple case of over-reaction (a very costly one, though).

My comment regarding the operating power levels of FM broadcast stations is probably not viable; I wish that receivers had been improved before stations' powers had increased--many receivers have improved. I have also wished that man-made 60-Hertz-based electrical noise had not become so great.

It is analogous to having a bright sodium-vapor street light in one's back yard--never again being able to see the stars at night. How wonderful it is to tune-in a distant AM station while driving along a forgotten stretch of highway at two-o'clock in the morning: "Hello! This is KGO, San Francisco."

More recently, I was upset to hear that the FCC had chosen Motorola C-Quam AM stereo as our nation's standard. Kahn-Hazeltine would have been better, because it was an initial step toward full independent-sideband (ISB) AM. ISB would have permitted AM carrier amplitudes of ten percent (10%) of normal.

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The need for ANSI C95.1-1992 would have been drastically altered, if all AM stations were broadcasting with only a small reference carrier. I doubt if C-Quan will ever adapt to any higher order of usefulness. Some argue that Congress is to blame for the AM stereo-standard mandate.

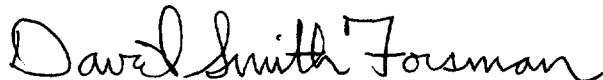
As an engineer, Mr. Stanley, your technical knowledge is, likely, greater than most members of Congress. The FCC, in cooperation with the National Bureau of Standards (NBS), should have made the final AM stereo-standard decision based on technical merits--not political ones.

FCC policy does not correct for deficient human nature in regard to poor technical practices, and I realize that your agency is limited in manpower and funding. And neither would I expect an FCC field officer/engineer assigned to every street corner of America.

Rather, we must all be "officers" and "engineers" of the honor system. My values are conveyed through the quality of the work that I do and in the work quality that I expect from others. FCC regulations are an integral part of my operating environment in radio. They, therefore, must be reasonable, workable, efficient, and effective.

Please be equally sensitive to the needs of all Americans during the final implementation process of ANSI C95.1-1992. The happiness, incomes, and well-being of many individuals will depend on it.

Sincerely yours,

A handwritten signature in cursive script that reads "David Smith Forsman". The signature is fluid and written in dark ink.

David Smith Forsman  
broadcast technician and radio amateur